EXHIBIT I

			P	age 1			
1	IN THE	UNITED STATES D	ISTRICT COURT				
2	N	NORTHERN DISTRICT OF OHIO					
3		EASTERN DIVIS	ION				
4							
5	DONALD J. HEINEY	,					
6	Plaint	iff,					
7	v.		Case N	ο.			
8	CORRECTIONAL SOL	UTIONS GROUP,	4:22-c	v-02232			
9	LLC; MELANIE AGN	ONE; JOSH DANKO;					
10	CANDY HIVELY; TY	CANDY HIVELY; TYLER PRVONOZAC;					
11	DAVID STANFIELD; LIEUTENANT						
12	DELP; SETH FRAISER; TOM MACKIE;						
13	and GEORGE WILSON,						
14	Defend	ants.					
15							
16	DEP	OSITION OF TINA I	M. HEINEY				
17	DATE: F	riday, December	6, 2024				
18	TIME: 1	2:04 p.m.					
19	LOCATION: R	eminger Co., LPA					
20	9	50 Windham Court	, Suite 200				
21	Y	oungstown, OH 44	512				
22	REPORTED BY: B	enjamin Fantauzzo	0				
23	JOB NO.: 7	016749					
24							
25							

Page 138 1 Q Now, speaking more in the short term, more 2 recent future, near future, have you guys discussed 3 having any aids come into the house to help? 4 A We just recently started talking about it. 5 Q Do you 6 A But, oh, money. I'm sorry. 7 Q Have you looked into whether his health 8 insurance would cover any type of in-home aid? 9 A No, I never thought of the health insurance. 10 But they're really limited. They they only gave 11 him even like, physical therapy and stuff, they 12 only gave you like, so many. You know, you can't just 13 keep going, 'cause you think he needs it or something. 14 You just can't. 15 Q Why has it been a recent discussion to get 16 an in-home aide? 17 A Like I said, just every it it all 18 happening kind of at one time; you know? Like him, 19 but then now, like now my mom and my dad, and I I 20 mean, I obviously have to take care of him, and they 21 help, but then I feel bad because, you know, maybe 22 they don't feel good today or something. 23 it's it's let on them to Now it to a something and it is a let on them to Now it is a let on them to Now it is a let on them to Now it help. 21 help, but then I feel bad because, you know, maybe 22 they don't feel good today or something. 23 it's let on them to Now it is a le	Page 140
2 recent future, near future, have you guys discussed 3 having any aids come into the house to help? 4 A We just recently started talking about it. 5 Q Do you 6 A But, oh, money. I'm sorry. 7 Q Have you looked into whether his health 8 insurance would cover any type of in-home aid? 9 A No, I never thought of the health insurance. 10 But they're really limited. They they only gave 11 him even like, physical therapy and stuff, they 12 only gave you like, so many. You know, you can't just 13 keep going, 'cause you think he needs it or something. 14 You just can't. 15 Q Why has it been a recent discussion to get 16 an in-home aide? 17 A Like I said, just every it it all 18 happening kind of at one time; you know? Like him, 19 but then now, like now my mom and my dad, and I I 20 mean, I obviously have to take care of him, and they 21 help, but then I feel bad because, you know, maybe 22 they don't feel good today or something. And it	
3 having any aids come into the house to help? 4 A We just recently started talking about it. 5 Q Do you 6 A But, oh, money. I'm sorry. 7 Q Have you looked into whether his health 8 insurance would cover any type of in-home aid? 9 A No, I never thought of the health insurance. 10 But they're really limited. They they only gave 11 him even like, physical therapy and stuff, they 12 only gave you like, so many. You know, you can't just 13 keep going, 'cause you think he needs it or something. 14 You just can't. 15 Q Why has it been a recent discussion to get 16 an in-home aide? 17 A Like I said, just every it it all 18 happening kind of at one time; you know? Like him, 19 but then now, like now my mom and my dad, and I I 20 mean, I obviously have to take care of him, and they 21 help, but then I feel bad because, you know, maybe 22 they don't feel good today or something. And it	
4 A We just recently started talking about it. 5 Q Do you 6 A But, oh, money. I'm sorry. 7 Q Have you looked into whether his health 8 insurance would cover any type of in-home aid? 9 A No, I never thought of the health insurance. 10 But they're really limited. They they only gave 11 him even like, physical therapy and stuff, they 12 only gave you like, so many. You know, you can't just 13 keep going, 'cause you think he needs it or something. 14 You just can't. 15 Q Why has it been a recent discussion to get 16 an in-home aide? 17 A Like I said, just every it it all 18 happening kind of at one time; you know? Like him, 19 but then now, like now my mom and my dad, and I I 20 mean, I obviously have to take care of him, and they 21 help, but then I feel bad because, you know, maybe 22 they don't feel good today or something. And it	
5 Q Do you 6 A But, oh, money. I'm sorry. 7 Q Have you looked into whether his health 8 insurance would cover any type of in-home aid? 9 A No, I never thought of the health insurance. 10 But they're really limited. They they only gave 11 him even like, physical therapy and stuff, they 12 only gave you like, so many. You know, you can't just 13 keep going, 'cause you think he needs it or something. 14 You just can't. 15 Q Why has it been a recent discussion to get 16 an in-home aide? 17 A Like I said, just every it it all 18 happening kind of at one time; you know? Like him, 19 but then now, like now my mom and my dad, and I I 20 mean, I obviously have to take care of him, and they 21 help, but then I feel bad because, you know, maybe 22 they don't feel good today or something. And it	1't,
6 A But, oh, money. I'm sorry. 7 Q Have you looked into whether his health 8 insurance would cover any type of in-home aid? 9 A No, I never thought of the health insurance. 10 But they're really limited. They they only gave 11 him even like, physical therapy and stuff, they 12 only gave you like, so many. You know, you can't just 13 keep going, 'cause you think he needs it or something. 14 You just can't. 15 Q Why has it been a recent discussion to get 16 an in-home aide? 17 A Like I said, just every it it all 18 happening kind of at one time; you know? Like him, 19 but then now, like now my mom and my dad, and I I 20 mean, I obviously have to take care of him, and they 21 help, but then I feel bad because, you know, maybe 22 they don't feel good today or something. And it	
7 Q Have you looked into whether his health 8 insurance would cover any type of in-home aid? 9 A No, I never thought of the health insurance. 10 But they're really limited. They they only gave 11 him even like, physical therapy and stuff, they 12 only gave you like, so many. You know, you can't just 13 keep going, 'cause you think he needs it or something. 14 You just can't. 15 Q Why has it been a recent discussion to get 16 an in-home aide? 17 A Like I said, just every it it all 18 happening kind of at one time; you know? Like him, 19 but then now, like now my mom and my dad, and I I 20 mean, I obviously have to take care of him, and they 21 help, but then I feel bad because, you know, maybe 22 they don't feel good today or something. And it	
8 insurance would cover any type of in-home aid? 9 A No, I never thought of the health insurance. 10 But they're really limited. They they only gave 11 him even like, physical therapy and stuff, they 12 only gave you like, so many. You know, you can't just 13 keep going, 'cause you think he needs it or something. 14 You just can't. 15 Q Why has it been a recent discussion to get 16 an in-home aide? 17 A Like I said, just every it it all 18 happening kind of at one time; you know? Like him, 19 but then now, like now my mom and my dad, and I I 20 mean, I obviously have to take care of him, and they 21 help, but then I feel bad because, you know, maybe 22 they don't feel good today or something. And it	
9 Q Hi, Tina. We met earlier. My name's 10 But they're really limited. They they only gave 11 him even like, physical therapy and stuff, they 12 only gave you like, so many. You know, you can't just 13 keep going, 'cause you think he needs it or something. 14 You just can't. 15 Q Why has it been a recent discussion to get 16 an in-home aide? 17 A Like I said, just every it it all 18 happening kind of at one time; you know? Like him, 19 but then now, like now my mom and my dad, and I I 20 mean, I obviously have to take care of him, and they 21 help, but then I feel bad because, you know, maybe 22 they don't feel good today or something. And it 20 Q Hi, Tina. We met earlier. My name's 10 I represent Dr. Wilson. 11 My first question is, outside of any 12 conversations you've had with your attorneys, 13 know who Dr. Wilson is? 14 A No. 15 Q In all your conversations with the COs 16 the nurses at Columbiana County Jail, did you 17 talk about a doctor during those discussions? 18 A No. 'Cause I didn't know there was on 19 I I asked him like, can he get to a hospital? 20 I didn't specifically ask for a doctor. 21 Q Okay. So no discussions about a doctor 22 any conversations you had with COs or the was	
10 But they're really limited. They they only gave 11 him even like, physical therapy and stuff, they 12 only gave you like, so many. You know, you can't just 13 keep going, 'cause you think he needs it or something. 14 You just can't. 15 Q Why has it been a recent discussion to get 16 an in-home aide? 17 A Like I said, just every it it all 18 happening kind of at one time; you know? Like him, 19 but then now, like now my mom and my dad, and I I 20 mean, I obviously have to take care of him, and they 21 help, but then I feel bad because, you know, maybe 22 they don't feel good today or something. And it	
11 him even like, physical therapy and stuff, they 12 only gave you like, so many. You know, you can't just 13 keep going, 'cause you think he needs it or something. 14 You just can't. 15 Q Why has it been a recent discussion to get 16 an in-home aide? 17 A Like I said, just every it it all 18 happening kind of at one time; you know? Like him, 19 but then now, like now my mom and my dad, and I I 20 mean, I obviously have to take care of him, and they 21 help, but then I feel bad because, you know, maybe 22 they don't feel good today or something. And it	Lach.
only gave you like, so many. You know, you can't just keep going, 'cause you think he needs it or something. You just can't. Q Why has it been a recent discussion to get an in-home aide? A Like I said, just every it it all happening kind of at one time; you know? Like him, but then now, like now my mom and my dad, and I I mean, I obviously have to take care of him, and they help, but then I feel bad because, you know, maybe they don't feel good today or something. And it	
13 keep going, 'cause you think he needs it or something. 14 You just can't. 15 Q Why has it been a recent discussion to get 16 an in-home aide? 17 A Like I said, just every it it all 18 happening kind of at one time; you know? Like him, 19 but then now, like now my mom and my dad, and I I 20 mean, I obviously have to take care of him, and they 21 help, but then I feel bad because, you know, maybe 22 they don't feel good today or something. And it 13 know who Dr. Wilson is? 14 A No. 15 Q In all your conversations with the COs the nurses at Columbiana County Jail, did you talk about a doctor during those discussions? 18 A No. 'Cause I didn't know there was on the pet to a hospital? 20 I didn't specifically ask for a doctor. 21 Q Okay. So no discussions about a doctor any conversations you had with COs or the was any conve	
14 You just can't. 15 Q Why has it been a recent discussion to get 16 an in-home aide? 17 A Like I said, just every it it all 18 happening kind of at one time; you know? Like him, 19 but then now, like now my mom and my dad, and I I 20 mean, I obviously have to take care of him, and they 21 help, but then I feel bad because, you know, maybe 22 they don't feel good today or something. And it 14 A No. 15 Q In all your conversations with the COs 16 the nurses at Columbiana County Jail, did you 17 talk about a doctor during those discussions? 18 A No. 'Cause I didn't know there was on 19 I I asked him like, can he get to a hospital? 20 I didn't specifically ask for a doctor. 21 Q Okay. So no discussions about a doctor any conversations you had with COs or the way	do you
15 Q Why has it been a recent discussion to get 16 an in-home aide? 17 A Like I said, just every it it all 18 happening kind of at one time; you know? Like him, 19 but then now, like now my mom and my dad, and I I 20 mean, I obviously have to take care of him, and they 21 help, but then I feel bad because, you know, maybe 22 they don't feel good today or something. And it 15 Q In all your conversations with the COs 16 the nurses at Columbiana County Jail, did you 17 talk about a doctor during those discussions? 18 A No. 'Cause I didn't know there was on 19 I I asked him like, can he get to a hospital? 20 I didn't specifically ask for a doctor. 21 Q Okay. So no discussions about a doctor any conversations you had with COs or the way.	
16 an in-home aide? 17 A Like I said, just every it it all 18 happening kind of at one time; you know? Like him, 19 but then now, like now my mom and my dad, and I I 20 mean, I obviously have to take care of him, and they 21 help, but then I feel bad because, you know, maybe 22 they don't feel good today or something. And it 16 the nurses at Columbiana County Jail, did you talk about a doctor during those discussions? 18 A No. 'Cause I didn't know there was on 19 I I asked him like, can he get to a hospital? 20 I didn't specifically ask for a doctor. 21 Q Okay. So no discussions about a doctor any conversations you had with COs or the was on 19 I I asked him like, can he get to a hospital? 20 Okay. So no discussions about a doctor during those discussions?	
17 A Like I said, just every it it all 18 happening kind of at one time; you know? Like him, 19 but then now, like now my mom and my dad, and I I 20 mean, I obviously have to take care of him, and they 21 help, but then I feel bad because, you know, maybe 22 they don't feel good today or something. And it 17 talk about a doctor during those discussions? 18 A No. 'Cause I didn't know there was on 19 I I asked him like, can he get to a hospital? 20 I didn't specifically ask for a doctor. 21 Q Okay. So no discussions about a doctor during those discussions? 22 I alk about a doctor during those discussions? 23 I didn't know there was on 24 I given by the like, can he get to a hospital? 25 I didn't specifically ask for a doctor. 26 I didn't specifically ask for a doctor. 27 I didn't specifically ask for a doctor. 28 I didn't specifically ask for a doctor. 29 I didn't specifically ask for a doctor. 20 I didn't specifically ask for a doctor. 21 Q Okay. So no discussions about a doctor. 21 A No. 'Cause I didn't know there was on a doctor. 22 I asked him like, can he get to a hospital? 23 I asked him like, can he get to a hospital? 24 I ask about a doctor during those discussions?	
happening kind of at one time; you know? Like him, but then now, like now my mom and my dad, and I I mean, I obviously have to take care of him, and they help, but then I feel bad because, you know, maybe help, but then I feel bad because, you know, maybe they don't feel good today or something. And it happening kind of at one time; you know? Like him, help, but then now, like now my mom and my dad, and I I help, but then I feel bad because, you know, maybe help, but then I feel bad because, you know, maybe help, but then I feel bad because, you know, maybe help, but then I feel bad because, you know, maybe help, but then I feel bad because, you know, maybe help, but then I feel bad because, you know, maybe help, but then I feel bad because, you know, maybe help, but then I feel bad because, you know, maybe help, but then I feel bad because, you know, maybe help, but then I feel bad because, you know, maybe help, but then I feel bad because, you know, maybe help, but then I feel bad because, you know, maybe help, but then I feel bad because, you know, maybe help, but then I feel bad because, you know, maybe help, but then I feel bad because, you know, maybe help, but then I feel bad because, you know, maybe	ever
19 but then now, like now my mom and my dad, and I I 20 mean, I obviously have to take care of him, and they 21 help, but then I feel bad because, you know, maybe 22 they don't feel good today or something. And it 19 I I asked him like, can he get to a hospital? 20 I didn't specifically ask for a doctor. 21 Q Okay. So no discussions about a doctor any conversations you had with COs or the way	
20 mean, I obviously have to take care of him, and they 21 help, but then I feel bad because, you know, maybe 22 they don't feel good today or something. And it 20 I didn't specifically ask for a doctor. 21 Q Okay. So no discussions about a doctor 22 any conversations you had with COs or the way).
21 help, but then I feel bad because, you know, maybe 22 they don't feel good today or something. And it 23 Q Okay. So no discussions about a doctor and conversations you had with COs or the way	But
22 they don't feel good today or something. And it 22 any conversations you had with COs or the wa	
	r with
22 it's sit's a lot on them too. Voy know that's	rden or
23 it's it's a lot on them too. You know, that's 23 the nurses at Columbiana?	
24 that's all. 24 A I don't believe so, no.	
25 Q The Social Security disability money that 25 Q Okay. I think you said, and I don't known	w if
Page 139	Page 141
1 Gaven gets, where is it deposited? 1 I misheard. I just want to make sure, when you	
2 A Into his account. 2 talking about the current residence at Nevada	Street,
3 Q And who has access to that account? 3 did you say there's not a yard to go outside for	
4 A My dad. 4 Gaven?	
5 Q At one point you had had a, I think a 5 A Very little. It's like the side of that,	
6 medical and financial power of attorney? 6 like this side and that of this room; do you know	
7 A Yes, ma'am. 7 I mean? Its like a real little yard across the side	e.
8 Q Do you still have that over Gaven? 8 It's been sitting for the dogs.	
9 A I don't I I don't know. I don't 9 Q Okay. So there's some green space yar	d
10 don't that trump it? 10 area?	
11 Q I would think, but I actually don't know. 11 A Yeah.	
12 A I don't either. 12 Q Okay. I am going to jump around a lit	
13 Q That's okay. 13 bit. I'm going to try to stay chronological as n	
14 A Yeah. I don't know. 14 as I can, but going second is sort of just going	
Q Would it be fair to say then that you don't 15 try to catch up on some things. So if at any po	int in
16 use it? 16 time you don't understand where I'm at in the	
17 A Yeah. 17 timeline, please just let me know; okay?	
18 Q Your dad would do any banking needs for 18 A Sure. Yes.	
19 Gaven? 19 Q So let's talk about Gaven after he stopp	ed
20 A Banking, yes. 20 working as a welder back in 2016; you with m	e?
21 MS. DINEHART: All right. I am going 21 A Yes.	
22 to turn it over to these gentlemen to ask all the 22 Q Did Gaven ever apply for any jobs any	where
23 questions I forgot. 23 after he stopped working as a welder?	
24 THE WITNESS: It's okay. 24 A He did. I can't remember the name of	
MR. HOOVER: I'm just going to talk to 25 place, but it was one of them, I think it was like	he

36 (Pages 138 - 141)

	Page 238		Page 240
1	BY MR. JAMISON:	1	MR. AMATO: No, not at this time.
2	Q With your most truthful answer?	2	THE REPORTER: Thank you.
	MR. THOMPSON: Sorry. I didn't mean	3	We are off the record at 5:02.
3	•	l	
4	to.	4	(Signature reserved.)
5	BY MR. JAMISON:	5	(Whereupon, at 5:02 p.m., the
6	Q Have we all given you a fair opportunity to	6	proceeding was concluded.)
7	answer our questions today?	7	
8	MR. THOMPSON: Objection.	8	
9	A Yeah.	9	
10	Q Okay. As a nurse, did you have any	10	
11	specialized training at all or certifications?	11	
12	MR. THOMPSON: No? You got to say	12	
13	something.	13	
14	THE WITNESS: No. Sorry.	14	
15	BY MR. JAMISON:	15	
16	Q You worked in I know it's been a long	16	
17	day. You always worked in med-surg?	17	
l	A Correct.	18	
18		l	
19	Q Did you ever work in the emergency room?	19	
20	A No.	20	
21	Q Okay. All right. And you didn't have any	21	
22	special training on addiction or withdrawal or	22	
23	anything like that?	23	
24	A I don't think so.	24	
25	MR. THOMPSON: Objection. Sorry.	25	
	Page 239		Page 241
1	MR. JAMISON: Nothing further. Thank	1	CERTIFICATE OF DEPOSITION OFFICER
2	you.	2	I, BENJAMIN FANTAUZZO, the officer before
3	THE WITNESS: Thank you.	3	whom the foregoing proceedings were taken, do hereby
4	MS. DINEHART: Nothing further.	4	certify that any witness(es) in the foregoing
5	THE REPORTER: All righty.	5	proceedings, prior to testifying, were duly sworn;
6	Ms. Dinehart, would you like to order	6	that the proceedings were recorded by me and
		7	thereafter reduced to typewriting by a qualified
7	the transcript?	8	transcriptionist; that said digital audio recording of
8	MS. DINEHART: Not at this time.	9	said proceedings are a true and accurate record to the
9	Mr. Jamison, would you like to order	10	best of my knowledge, skills, and ability; that I am
10	the transcript?	11	neither counsel for, related to, nor employed by any
11	MR. JAMISON: Yeah, let's we'll	12	of the parties to the action in which this was taken;
12	order it.	13	and, further, that I am not a relative or employee of
13	THE REPORTER: Okay.	14	any counsel or attorney employed by the parties
14	MR. JAMISON: Let's do a E-tran,	15	hereto, nor financially or otherwise interested in the
15	please.	16	outcome of this
16	THE REPORTER: Mr. Hoover, would you	10	Sugn & Fortage
17	like to order the transcript?	17	BENJAMIN FANTAUZZO
18	MR. HOOVER: I will take a copy.	l	
19	THE REPORTER: Mr. Thompson, would you	18	Notary Public in and for the
20	like to order the transcript?	19	State of Ohio
21	MR. THOMPSON: Not at this time.	20	[V] Designs of the torus
		21	[X] Review of the transcript was requested.
22	Witness will read.	22	
23	THE REPORTER: All right. And then	23	
24	last, Mr. Amato, would you like to order the	24	
25	transcript?	25	

1	Page 242		Page 244
1	CERTIFICATE OF TRANSCRIBER		Donald J. Heiney v. Correctional Solutions Group, LLC, Et Al.
2	I, HEATHER VISSIA, do hereby certify that this transcript was prepared from the digital audio		Tina M. Heiney (#7016749)
4	recording of the foregoing proceeding, that said	3	ERRATA SHEET
5	transcript is a true and accurate record of the		PAGELINECHANGE
6	proceedings to the best of my knowledge, skills, and		PEAGON
7	ability; that I am neither counsel for, related to,		REASON
8	nor employed by any of the parties to the action in	8	PAGELINECHANGE
9	which this was taken; and, further, that I am not a		REASON
10	relative or employee of any counsel or attorney		
11	employed by the parties hereto, nor financially or		PAGELINECHANGE
12	otherwise interested in the outcome of this action.		REASON
13	, $,$ t $,$		PAGELINECHANGE
14	H.N. Vi	14	- CHANGE
1.5			REASON
15	HEATHER VISSIA		PAGELINECHANGE
16 17		17	
18		18	REASON
19			PAGELINECHANGE
20		20	
21		21	REASON
22		22	
23		23	
24		24	Tina M. Heiney Date
25		25	·
	Page 243		Page 245
1	Page 243 ANDREW THOMPSON, ESOUIRE	1	Page 245 Donald J. Heinev v. Correctional Solutions Group, LLC, Et Al.
1 2	ANDREW THOMPSON, ESQUIRE		Donald J. Heiney v. Correctional Solutions Group, LLC, Et Al.
	-		e l
2	ANDREW THOMPSON, ESQUIRE athompson@shaperoroloff.com	2	Donald J. Heiney v. Correctional Solutions Group, LLC, Et Al. Tina M. Heiney (#7016749)
2	ANDREW THOMPSON, ESQUIRE athompson@shaperoroloff.com December 26, 2024	2 3 4	Donald J. Heiney v. Correctional Solutions Group, LLC, Et Al. Tina M. Heiney (#7016749) ACKNOWLEDGEMENT OF DEPONENT
2 3 4	ANDREW THOMPSON, ESQUIRE athompson@shaperoroloff.com December 26, 2024 RE: Donald J. Heiney v. Correctional Solutions Group, LLC,	2 3 4 5	Donald J. Heiney v. Correctional Solutions Group, LLC, Et Al. Tina M. Heiney (#7016749) ACKNOWLEDGEMENT OF DEPONENT I, Tina M. Heiney, do hereby declare that I
2 3 4 5 6	ANDREW THOMPSON, ESQUIRE athompson@shaperoroloff.com December 26, 2024 RE: Donald J. Heiney v. Correctional Solutions Group, LLC, 12/6/2024, Tina M. Heiney (#7016749)	2 3 4 5 6	Donald J. Heiney v. Correctional Solutions Group, LLC, Et Al. Tina M. Heiney (#7016749) ACKNOWLEDGEMENT OF DEPONENT I, Tina M. Heiney, do hereby declare that I have read the foregoing transcript, I have made any
2 3 4 5 6	ANDREW THOMPSON, ESQUIRE athompson@shaperoroloff.com December 26, 2024 RE: Donald J. Heiney v. Correctional Solutions Group, LLC, 12/6/2024, Tina M. Heiney (#7016749) The above-referenced transcript is available for	2 3 4 5 6 7	Donald J. Heiney v. Correctional Solutions Group, LLC, Et Al. Tina M. Heiney (#7016749) ACKNOWLEDGEMENT OF DEPONENT I, Tina M. Heiney, do hereby declare that I have read the foregoing transcript, I have made any corrections, additions, or changes I deemed necessary as
2 3 4 5 6 7	ANDREW THOMPSON, ESQUIRE athompson@shaperoroloff.com December 26, 2024 RE: Donald J. Heiney v. Correctional Solutions Group, LLC, 12/6/2024, Tina M. Heiney (#7016749) The above-referenced transcript is available for review.	2 3 4 5 6 7 8	Donald J. Heiney v. Correctional Solutions Group, LLC, Et Al. Tina M. Heiney (#7016749) ACKNOWLEDGEMENT OF DEPONENT I, Tina M. Heiney, do hereby declare that I have read the foregoing transcript, I have made any corrections, additions, or changes I deemed necessary as noted above to be appended hereto, and that the same is
2 3 4 5 6 7 8	ANDREW THOMPSON, ESQUIRE athompson@shaperoroloff.com December 26, 2024 RE: Donald J. Heiney v. Correctional Solutions Group, LLC, 12/6/2024, Tina M. Heiney (#7016749) The above-referenced transcript is available for review. Within the applicable timeframe, the witness should	2 3 4 5 6 7 8	Donald J. Heiney v. Correctional Solutions Group, LLC, Et Al. Tina M. Heiney (#7016749) ACKNOWLEDGEMENT OF DEPONENT I, Tina M. Heiney, do hereby declare that I have read the foregoing transcript, I have made any corrections, additions, or changes I deemed necessary as noted above to be appended hereto, and that the same is a true, correct and complete transcript of the testimony
2 3 4 5 6 7 8 9	ANDREW THOMPSON, ESQUIRE athompson@shaperoroloff.com December 26, 2024 RE: Donald J. Heiney v. Correctional Solutions Group, LLC, 12/6/2024, Tina M. Heiney (#7016749) The above-referenced transcript is available for review. Within the applicable timeframe, the witness should read the testimony to verify its accuracy. If there are	2 3 4 5 6 7 8 9	Donald J. Heiney v. Correctional Solutions Group, LLC, Et Al. Tina M. Heiney (#7016749) ACKNOWLEDGEMENT OF DEPONENT I, Tina M. Heiney, do hereby declare that I have read the foregoing transcript, I have made any corrections, additions, or changes I deemed necessary as noted above to be appended hereto, and that the same is a true, correct and complete transcript of the testimony given by me.
2 3 4 5 6 7 8 9	ANDREW THOMPSON, ESQUIRE athompson@shaperoroloff.com December 26, 2024 RE: Donald J. Heiney v. Correctional Solutions Group, LLC, 12/6/2024, Tina M. Heiney (#7016749) The above-referenced transcript is available for review. Within the applicable timeframe, the witness should read the testimony to verify its accuracy. If there are any changes, the witness should note those with the	2 3 4 5 6 7 8 9	Donald J. Heiney v. Correctional Solutions Group, LLC, Et Al. Tina M. Heiney (#7016749) ACKNOWLEDGEMENT OF DEPONENT I, Tina M. Heiney, do hereby declare that I have read the foregoing transcript, I have made any corrections, additions, or changes I deemed necessary as noted above to be appended hereto, and that the same is a true, correct and complete transcript of the testimony
2 3 4 5 6 7 8 9 10 11 12	ANDREW THOMPSON, ESQUIRE athompson@shaperoroloff.com December 26, 2024 RE: Donald J. Heiney v. Correctional Solutions Group, LLC, 12/6/2024, Tina M. Heiney (#7016749) The above-referenced transcript is available for review. Within the applicable timeframe, the witness should read the testimony to verify its accuracy. If there are any changes, the witness should note those with the reason, on the attached Errata Sheet. The witness should sign the Acknowledgment of	2 3 4 5 6 7 8 9 10	Donald J. Heiney v. Correctional Solutions Group, LLC, Et Al. Tina M. Heiney (#7016749) ACKNOWLEDGEMENT OF DEPONENT I, Tina M. Heiney, do hereby declare that I have read the foregoing transcript, I have made any corrections, additions, or changes I deemed necessary as noted above to be appended hereto, and that the same is a true, correct and complete transcript of the testimony given by me.
2 3 4 5 6 7 8 9 10 11 12	ANDREW THOMPSON, ESQUIRE athompson@shaperoroloff.com	2 3 4 5 6 7 8 9 10 11 12	Donald J. Heiney v. Correctional Solutions Group, LLC, Et Al. Tina M. Heiney (#7016749) ACKNOWLEDGEMENT OF DEPONENT I, Tina M. Heiney, do hereby declare that I have read the foregoing transcript, I have made any corrections, additions, or changes I deemed necessary as noted above to be appended hereto, and that the same is a true, correct and complete transcript of the testimony given by me. Tina M. Heiney Date
2 3 4 5 6 7 8 9 10 11 12 13	ANDREW THOMPSON, ESQUIRE athompson@shaperoroloff.com December 26, 2024 RE: Donald J. Heiney v. Correctional Solutions Group, LLC, 12/6/2024, Tina M. Heiney (#7016749) The above-referenced transcript is available for review. Within the applicable timeframe, the witness should read the testimony to verify its accuracy. If there are any changes, the witness should note those with the reason, on the attached Errata Sheet. The witness should sign the Acknowledgment of Deponent and Errata and return to the deposing attorney.	2 3 4 5 6 7 8 9 10 11 12 13	Donald J. Heiney v. Correctional Solutions Group, LLC, Et Al. Tina M. Heiney (#7016749) ACKNOWLEDGEMENT OF DEPONENT I, Tina M. Heiney, do hereby declare that I have read the foregoing transcript, I have made any corrections, additions, or changes I deemed necessary as noted above to be appended hereto, and that the same is a true, correct and complete transcript of the testimony given by me. Tina M. Heiney Date *If notary is required
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	ANDREW THOMPSON, ESQUIRE athompson@shaperoroloff.com December 26, 2024 RE: Donald J. Heiney v. Correctional Solutions Group, LLC, 12/6/2024, Tina M. Heiney (#7016749) The above-referenced transcript is available for review. Within the applicable timeframe, the witness should read the testimony to verify its accuracy. If there are any changes, the witness should note those with the reason, on the attached Errata Sheet. The witness should sign the Acknowledgment of Deponent and Errata and return to the deposing attorney. Copies should be sent to all counsel, and to Veritext at erratas-cs@veritext.com Return completed errata within 30 days from	2 3 4 5 6 7 8 9 10 11 12 13 14	Donald J. Heiney v. Correctional Solutions Group, LLC, Et Al. Tina M. Heiney (#7016749) ACKNOWLEDGEMENT OF DEPONENT I, Tina M. Heiney, do hereby declare that I have read the foregoing transcript, I have made any corrections, additions, or changes I deemed necessary as noted above to be appended hereto, and that the same is a true, correct and complete transcript of the testimony given by me. Tina M. Heiney Date *If notary is required SUBSCRIBED AND SWORN TO BEFORE ME THIS
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	ANDREW THOMPSON, ESQUIRE athompson@shaperoroloff.com December 26, 2024 RE: Donald J. Heiney v. Correctional Solutions Group, LLC, 12/6/2024, Tina M. Heiney (#7016749) The above-referenced transcript is available for review. Within the applicable timeframe, the witness should read the testimony to verify its accuracy. If there are any changes, the witness should note those with the reason, on the attached Errata Sheet. The witness should sign the Acknowledgment of Deponent and Errata and return to the deposing attorney. Copies should be sent to all counsel, and to Veritext at erratas-cs@veritext.com Return completed errata within 30 days from receipt of testimony.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Donald J. Heiney v. Correctional Solutions Group, LLC, Et Al. Tina M. Heiney (#7016749) ACKNOWLEDGEMENT OF DEPONENT I, Tina M. Heiney, do hereby declare that I have read the foregoing transcript, I have made any corrections, additions, or changes I deemed necessary as noted above to be appended hereto, and that the same is a true, correct and complete transcript of the testimony given by me. Tina M. Heiney Date *If notary is required SUBSCRIBED AND SWORN TO BEFORE ME THIS
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	ANDREW THOMPSON, ESQUIRE athompson@shaperoroloff.com December 26, 2024 RE: Donald J. Heiney v. Correctional Solutions Group, LLC, 12/6/2024, Tina M. Heiney (#7016749) The above-referenced transcript is available for review. Within the applicable timeframe, the witness should read the testimony to verify its accuracy. If there are any changes, the witness should note those with the reason, on the attached Errata Sheet. The witness should sign the Acknowledgment of Deponent and Errata and return to the deposing attorney. Copies should be sent to all counsel, and to Veritext at erratas-cs@veritext.com Return completed errata within 30 days from receipt of testimony. If the witness fails to do so within the time	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Donald J. Heiney v. Correctional Solutions Group, LLC, Et Al. Tina M. Heiney (#7016749) ACKNOWLEDGEMENT OF DEPONENT I, Tina M. Heiney, do hereby declare that I have read the foregoing transcript, I have made any corrections, additions, or changes I deemed necessary as noted above to be appended hereto, and that the same is a true, correct and complete transcript of the testimony given by me. Tina M. Heiney Date *If notary is required SUBSCRIBED AND SWORN TO BEFORE ME THIS DAY OF
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	ANDREW THOMPSON, ESQUIRE athompson@shaperoroloff.com December 26, 2024 RE: Donald J. Heiney v. Correctional Solutions Group, LLC, 12/6/2024, Tina M. Heiney (#7016749) The above-referenced transcript is available for review. Within the applicable timeframe, the witness should read the testimony to verify its accuracy. If there are any changes, the witness should note those with the reason, on the attached Errata Sheet. The witness should sign the Acknowledgment of Deponent and Errata and return to the deposing attorney. Copies should be sent to all counsel, and to Veritext at erratas-cs@veritext.com Return completed errata within 30 days from receipt of testimony.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Donald J. Heiney v. Correctional Solutions Group, LLC, Et Al. Tina M. Heiney (#7016749) ACKNOWLEDGEMENT OF DEPONENT I, Tina M. Heiney, do hereby declare that I have read the foregoing transcript, I have made any corrections, additions, or changes I deemed necessary as noted above to be appended hereto, and that the same is a true, correct and complete transcript of the testimony given by me. Tina M. Heiney Date *If notary is required SUBSCRIBED AND SWORN TO BEFORE ME THIS
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	ANDREW THOMPSON, ESQUIRE athompson@shaperoroloff.com December 26, 2024 RE: Donald J. Heiney v. Correctional Solutions Group, LLC, 12/6/2024, Tina M. Heiney (#7016749) The above-referenced transcript is available for review. Within the applicable timeframe, the witness should read the testimony to verify its accuracy. If there are any changes, the witness should note those with the reason, on the attached Errata Sheet. The witness should sign the Acknowledgment of Deponent and Errata and return to the deposing attorney. Copies should be sent to all counsel, and to Veritext at erratas-cs@veritext.com Return completed errata within 30 days from receipt of testimony. If the witness fails to do so within the time	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Donald J. Heiney v. Correctional Solutions Group, LLC, Et Al. Tina M. Heiney (#7016749) ACKNOWLEDGEMENT OF DEPONENT I, Tina M. Heiney, do hereby declare that I have read the foregoing transcript, I have made any corrections, additions, or changes I deemed necessary as noted above to be appended hereto, and that the same is a true, correct and complete transcript of the testimony given by me. Tina M. Heiney Date *If notary is required SUBSCRIBED AND SWORN TO BEFORE ME THIS DAY OF
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	ANDREW THOMPSON, ESQUIRE athompson@shaperoroloff.com December 26, 2024 RE: Donald J. Heiney v. Correctional Solutions Group, LLC, 12/6/2024, Tina M. Heiney (#7016749) The above-referenced transcript is available for review. Within the applicable timeframe, the witness should read the testimony to verify its accuracy. If there are any changes, the witness should note those with the reason, on the attached Errata Sheet. The witness should sign the Acknowledgment of Deponent and Errata and return to the deposing attorney. Copies should be sent to all counsel, and to Veritext at erratas-cs@veritext.com Return completed errata within 30 days from receipt of testimony. If the witness fails to do so within the time allotted, the transcript may be used as if signed.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Donald J. Heiney v. Correctional Solutions Group, LLC, Et Al. Tina M. Heiney (#7016749) ACKNOWLEDGEMENT OF DEPONENT I, Tina M. Heiney, do hereby declare that I have read the foregoing transcript, I have made any corrections, additions, or changes I deemed necessary as noted above to be appended hereto, and that the same is a true, correct and complete transcript of the testimony given by me. Tina M. Heiney Date *If notary is required SUBSCRIBED AND SWORN TO BEFORE ME THIS DAY OF
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	ANDREW THOMPSON, ESQUIRE athompson@shaperoroloff.com	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Donald J. Heiney v. Correctional Solutions Group, LLC, Et Al. Tina M. Heiney (#7016749) ACKNOWLEDGEMENT OF DEPONENT I, Tina M. Heiney, do hereby declare that I have read the foregoing transcript, I have made any corrections, additions, or changes I deemed necessary as noted above to be appended hereto, and that the same is a true, correct and complete transcript of the testimony given by me. Tina M. Heiney Date *If notary is required SUBSCRIBED AND SWORN TO BEFORE ME THIS DAY OF
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	ANDREW THOMPSON, ESQUIRE athompson@shaperoroloff.com December 26, 2024 RE: Donald J. Heiney v. Correctional Solutions Group, LLC, 12/6/2024, Tina M. Heiney (#7016749) The above-referenced transcript is available for review. Within the applicable timeframe, the witness should read the testimony to verify its accuracy. If there are any changes, the witness should note those with the reason, on the attached Errata Sheet. The witness should sign the Acknowledgment of Deponent and Errata and return to the deposing attorney. Copies should be sent to all counsel, and to Veritext at erratas-cs@veritext.com Return completed errata within 30 days from receipt of testimony. If the witness fails to do so within the time allotted, the transcript may be used as if signed.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Donald J. Heiney v. Correctional Solutions Group, LLC, Et Al. Tina M. Heiney (#7016749) ACKNOWLEDGEMENT OF DEPONENT I, Tina M. Heiney, do hereby declare that I have read the foregoing transcript, I have made any corrections, additions, or changes I deemed necessary as noted above to be appended hereto, and that the same is a true, correct and complete transcript of the testimony given by me. Tina M. Heiney Date *If notary is required SUBSCRIBED AND SWORN TO BEFORE ME THIS DAY OF
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	ANDREW THOMPSON, ESQUIRE athompson@shaperoroloff.com	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Donald J. Heiney v. Correctional Solutions Group, LLC, Et Al. Tina M. Heiney (#7016749) ACKNOWLEDGEMENT OF DEPONENT I, Tina M. Heiney, do hereby declare that I have read the foregoing transcript, I have made any corrections, additions, or changes I deemed necessary as noted above to be appended hereto, and that the same is a true, correct and complete transcript of the testimony given by me. Tina M. Heiney Date *If notary is required SUBSCRIBED AND SWORN TO BEFORE ME THIS DAY OF

62 (Pages 242 - 245)